



February 2, 2021

Aaron Hendrickson
500 S. Clark Street
Mayville WI, 53050

Subject: Seneca Foods Corp. Mayville - WPDES Permit WI- 0050822-07-1
Water Quality Trading Plan – CONDITIONAL APPROVAL

Dear Mr. Hendrickson:

The Department recently received a water quality trading plan (WQT Plan) for compliance with phosphorus & TSS effluent limits at Seneca Foods - Mayville. The initial plan was received in October of 2020 and an updated version was received in January 2021. Based on WDNR review, the final WQT Plan (dated January 2021) is in general conformance with the WDNR Water Quality Trading Guidance and Section 283.84 of the Wisconsin Statutes. Credits generated from approved practices result in available credit quantities shown in Table 1. These credits will be incorporated into the reissued WPDES permit and will be used to demonstrate compliance with final phosphorus & TSS effluent limits beginning October 1st, 2023.

Table 1: Total Phosphorus Credits Available per WQT-2021-0003

Year	Available Credits (lbs/yr) – Interim	Available Credits (lbs/yr) – Long Term	Available Credits (lbs/yr) – Total
2021	24.8	39.9	64.7
2022	33.1	53.2	86.3
2023	33.1	53.2	86.3
2024	33.1	53.2	86.3
2025	33.1	53.2	86.3

Table 2: Total Suspended Solids Credits Available per WQT-2021-0003

Year	Available Credits (lbs/yr) – Interim	Available Credits (lbs/yr) – Long Term	Available Credits (lbs/yr) – Total
2021	6,600	12,750	19,350
2022	8,800	17,00	25,800

2023	8,800	17,000	25,800
2024	8,800	17,000	25,800
2025	8,800	17,000	25,800

The Department conditionally approves the WQT Plan as a basis for water quality trading during the next WPDES permit term. This approval is not to be construed as an approval for any activities requiring a permit under ch. 30 or 31, Wis. Stats. The Department has assigned the WQT plan a tracking number of WQT-2021-0003 and will be referenced as such in the draft WPDES permit. The final WQT plan will be included as part of the public notice package for permit reissuance. The draft WPDES permit will include a requirement for an annual trading report and effluent monitoring for total phosphorus.

If you have any questions or comments, please contact me at 608-535-0368 or at sean.spencer@wisconsin.gov

Thank You,



Sean Spencer
Wastewater Specialist
Wisconsin Department of Natural Resources

e-CC:

Robert Wendt, Applied Science Inc.
Nick Huettl, Applied Science Inc.
Brenda Howald, WDNR
Alan Hopfensperger, WDNR